

REMARKS

Applicant appreciates the Examiner's thorough consideration provided in the present application. Claims 1-3 are currently pending in the instant application. Claim 1 has been amended. Claim 1 is independent.

Reasons for Entry of Amendment

As discussed in greater detail hereinafter, Applicant respectfully submits that the rejections under 35 U.S.C. § 102(b) are improper and should be withdrawn. Accordingly, the finality of the Final Office Action mailed on April 22, 2004 should be withdrawn.

If the Examiner persists in maintaining these rejections, Applicant submits that this Amendment was not presented at an earlier date in view of the fact that Applicant is responding to new grounds of rejection in a Final Office Action. In accordance with the requirements of 37 CFR 1.116, Applicant respectfully requests entry and consideration of the foregoing amendments as they remove issues for appeal and place the current application in a condition for allowance.

Claim Rejections Under 35 U.S.C. § 102

Claims 1 and 2 have been rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by Sergeant et al. (U.S. Patent No. 5,627,616). This rejection is respectfully traversed.

In light of the foregoing amendments to the claims, Applicant respectfully submits that all of the rejections have been obviated and/or rendered moot. Without conceding the propriety of the Examiner's rejection, but merely to expedite the prosecution of the present application, Applicant has amended claim 1 to clarify the claimed invention for the benefit of the Examiner. However, Applicant submits that this claim has been amended to merely explicitly state those features that were already implicitly claimed in claim 1. Accordingly, this rejection has been obviated and/or rendered moot.

Specifically, Applicant submits that the prior art of record fails to teach or suggest each and every limitation of the unique combination of limitations of the claimed invention. With respect to claim 1, Applicant submits that the prior art of record fails to teach or suggest each and every limitation of the unique combination of limitations of the claimed invention, including the feature(s) of: *"a data converter which detects a data format of a communication data outputted from the operation part and converts the communication data outputted from the operation part including the control signal into a data format*

used in serial communication which conforms with a data format for the remote control pan head if the data format of the communication data differs from the data format for the remote control pan head, and transmits the converted communication data to the remote control pan head.” (emphasis added)
Accordingly, this rejection should be withdrawn.

In contrast to the claimed invention, Sergeant et al. (U.S. Patent No. 5,627,616) describes that a signal distribution unit 104 or a receiver 132 converts a data format. However, such conversion of a data format is merely converting communication data into a serial communication, or converting a serial communication into a parallel communication. Therefore, the invention of Sergeant differs from the present invention in several respects.

Specifically, the data conversion of Sergeant et al. relates closely to a matter of hardware, i.e. method, rather than a matter of software. In the market of converters with hardware, converters that convert data between RS-232 and RS-485 or between LAN (Ethernet) and RS-232 are generally known, and such data conversion has been accomplished regardless of a system within a pan head. The Examiner is requested to review FIGs. 2, 3 and 4 of U.S. Patent No. 5,515,099 (Cortjens et al.) to better understand this type of system.

With the converter for converting data between LAN(Ethernet) and RS-232, the converter communicates on the LAN(Ethernet) through a

communication sequence such as a TCP/IP protocol. In this case, the data to be transmitted to RS-232C is without a control header portion of the TCP/IP protocol transmitted by the LAN, hence this type of converter which then transmits the extracted data without the control header portion to RS-232 is different from the claimed invention of claim 1. For example, the Examiner is requested to review U.S. Patent No. 6,226,035 (Korein et al.-FIG. 6) to illustrate this type of conversion method applied to a pan head system.

In contrast, the claimed invention differs from the Sergeant et al. reference and the remaining references of the prior art of record since the claimed invention is directed to an issue concerning software, not hardware as in Sergeant et al.. Specifically, the claimed invention is aimed at achieving a single communication through the converting device, e.g., communications between control devices each of which has different data format such as character-based communication or a bit-based communication. In other words, the claimed invention relates to converting data such as the data without the control header described above. An additional example is provided hereinafter for the Examiner's better understanding of the unique features of the claimed invention.

A typical control data of a conventional pan head may include:

81_H, 3F_H, 7F_H, 78_H, 50_H, 14_H, 69_H

This data includes values for zoom, focus, pan, tilt, iris, and master pedestal in a binary data format. If this data is converted into data in a different data format (a pan head system is required to be used but the pan head system cannot be operated with the control data in the above format), the above control data must be converted into a format which accords with the protocol type of the pan head system. In this case, the data is converted as follows (converted into ASCII code format, i.e. character code): P3fT50 . . . there was a change in pan and tilt only, thus other data was not converted. In this case, data in binary format is converted to data in ASCII code format.

Therefore, in terms of content of data conversion the claimed invention is different than the references of the prior art of record. The Examiner will appreciate that Sergeant et al. fails to disclose conforming data format in a case where the data formats between the two control devices differ. Sergeant et al. describe an example where addresses may differ (Col. 7, line 64-68), but fails to teach or suggest a case where formats of the addresses differ. In the claimed invention, the pan head can be controlled by the data whose format conforms with the format of the data for the pan head system. Further, the pan head can be controlled in this unique manner even though data with a variety of formats is transmitted from the control part. Accordingly, this rejection should be withdrawn.

Claim Rejections Under 35 U.S.C. § 103

Claim 3 has been rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Sergeant et al. in view of Cortjens et al. (U.S. Patent No. 5,515,099). This rejection is respectfully traversed.

As described in greater detail hereinabove, Applicant submits that the prior art of record fails to teach or suggest each and every limitation of the unique combination of limitations of the claimed invention of claim 1. Since Cortjens et al. fail to teach or suggest the shortcomings of the Sergeant et al. reference identified hereinabove, this rejection should be withdrawn.

Cortjens (US5,515,099) describes a video conferencing system, wherein the network converter 11 converts signals from the mouse 12 or the joystick 18 into signals appropriate for the pan/tilt mechanism (Col. 6, lines 48-51). However, Cortjens et al. fail to teach or suggest a converter that converts a control signal for controlling a pan head system into a data format applicable to a remote control pan head. Accordingly, the unique communication format of the control unit in the claimed invention is not taught or suggested by the prior art of record.

Accordingly, reconsideration and withdrawal of the claim rejections are respectfully requested. Moreover, Applicant respectfully submits that the instant application is in a condition for allowance.

As to the dependent claims, Applicant respectfully submits that these claims are allowable due to their dependence upon an allowable independent claim, as well as for additional limitations provided by these claims.

CONCLUSION

Since the remaining references cited by the Examiner have not been utilized to reject the claims, but merely to show the state-of-the-art, no further comments are deemed necessary with respect thereto.

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

Applicant respectfully petitions under the provisions of 37 C.F.R. § 1.136(a) and § 1.17 for a one-month extension of time in which to respond to the Examiner's Office Action. The Extension of Time Fee in the amount of **\$110.00** is attached hereto.

In the event there are any matters remaining in this application, the Examiner is invited to contact Matthew T. Shanley, Registration No. 47,074 at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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